

REMARKS

Claims 1-26 were originally filed in the present application. No claims are currently added, canceled, or amended. Consequently, claims 1-26 are currently pending in the present application. Reconsideration of the present application in light of the following remarks is respectfully requested.

Rejections under 35 U.S.C. §103(a)

Claims 1-26 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,311,187 to Jeyaraman ("Jeyaraman") in view of Peters, "Advanced Tutorial – Simulation-Based Scheduling and Control" from Proceedings of the 1996 Winter Simulation Conference ("Peters"). Applicants traverse this rejection on the grounds that these references are defective in establishing a *prima facie* case of obviousness with respect to claims 1-26.

As the PTO recognizes in MPEP §2142:

... The Examiner bears the initial burden of factually supporting any prima facie conclusion of obviousness. If the Examiner does not produce a prima facie case, the applicant is under no obligation to submit evidence of nonobviousness...

It is submitted that, in the present case, the Examiner has not factually supported a *prima facie* case of obviousness for the following reasons.

Claim 1

Claim 1 recites:

1. A method of improving the performance of a relational database data reduction from a source database to a target database, comprising of:

analyzing time and date stamp of a record in the source database to determine if the record has been changed as a result of a change of position of a lot from a first equipment to a second equipment;

in response to a determination that the record has been changed, locating the record in a target table of the first equipment in the target database based on an identifier of the lot in the record;

deleting the record from the target table of the first equipment in the target database; and
inserting the record into a target table of the second equipment in the target database.

However, as provided in 35 U.S.C. §103:

A patent may not be obtained ... if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which the subject matter pertains ... (Emphasis added)

Thus, when evaluating a claim for determining obviousness, all limitations of the claim must be evaluated. However, in the context of claim 1, Jeyaraman fails to teach locating the record in a target table of the first equipment in the target database based on an identifier of the lot in the record, and then deleting the record from the target table of the first equipment in the target database. Nonetheless, the Examiner refers to Jeyaraman, column 5, lines 56-60 as allegedly disclosing locating and deleting the record in a target table of the first equipment. However, this reference merely teaches specifying manipulation operations for leaf nodes (column 5, lines 56-60), which is clearly different from or otherwise falls short of locating a record in a target table of the **first equipment** and deleting the record from the target table of the **first equipment**.

Moreover, Jeyaraman also fails to teach inserting a record (and specifically the located and deleted record) into a target table of the second equipment in the target database, in the context of claim 1. Nonetheless, the Examiner also refers to Jeyaraman, Figure 3, step 316 and column 6, lines 16-18 as allegedly disclosing inserting a record into a target table of second equipment in the target database. However, this reference merely teaches sending the update from a server to a client and applying the update to a client, which is clearly different from inserting a record into a target table of the **second equipment**.

In addition, Peters fails to cure the above-described shortcomings of Jeyaraman. For example, Peters also fails to disclose locating a record in a target table of first equipment in a

target database based on an identifier of a lot in the record, then deleting the record from the target table of the first equipment in the target database, and then inserting the record into a target table of second equipment in the target database, as recited in claim 1. In contrast, Peters merely discloses: "the results of the real-time simulation execution are stored in a database. The real-time results are the data on how the system actually operates." (Peters, pg. 196, second column, paragraph 2). Thus, Peters fails to teach the operation of the database at the record manipulation level. Consequently, Peters also fails to disclose locating the record in a target table of the first equipment, deleting the record from the target table of the first equipment, and inserting the record into a target table of the second equipment.

Accordingly, the Examiner's burden of factually supporting a *prima facie* case of obviousness of claim 1 clearly cannot be met by the combination of Jeyaraman and Peters. Therefore, Applicants respectfully request that the Examiner withdraw the rejection under 35 U.S.C. §103 of claim 1 and its dependent claims.

Claim 9

Claim 9 recites:

9. A method for refining data replication between a source database and a target database, comprising of:
 - determining if a record in the source database has been changed as a result of a change of position of a lot from a first equipment to a second equipment;
 - in response to a determination that the record in the source database has been changed, locating a record in a target table of the first equipment in the target database based on an identifier of the lot in the record;
 - deleting the record from the target table of the first equipment in the target database; and
 - inserting the record into a target table of a second equipment in the target database.

Claim 9 was also rejected under 35 U.S.C. §103(a) as being unpatentable over Jeyaraman in view of Peters. However, much in the same manner as described above with regard to claim 1,

the combination of Jeyaraman and Peters does not disclose locating a record in a target table of the first equipment in the target database based on an identifier of the lot in the record; deleting the record from the target table of the first equipment in the target database; and inserting the record into a target table of a second equipment in the target database in the context of claim 9 or otherwise.

Accordingly, the Examiner's burden of factually supporting a *prima facie* case of obviousness of claim 9 clearly cannot be met by the combination of Jeyaraman and Peters. Therefore, Applicants respectfully request that the Examiner withdraw the rejection under 35 U.S.C. §103 of claim 9 and its dependent claims.

Claim 14

Claim 14 recites:

14. A system for improving the performance of a relational database data reduction from a source database to a target database, comprising of:

analyzing means for analyzing time and date stamp of a record in the source database to determine if the record has been changed as a result of a change of position of a lot from a first equipment to a second equipment;

locating means for locating the record in a target table of the first equipment in the target database based on an identifier of the lot in the record in response to a determination that the record has been changed;

deleting means for deleting the record from the target table of the first equipment in the target database; and

inserting means for inserting the record into a target table of the second equipment in the target database.

Claim 14 was also rejected under 35 U.S.C. §103(a) as being unpatentable over Jeyaraman in view of Peters. However, much in the same manner as described above with regard to claims 1 and 9, the combination of Jeyaraman and Peters does not disclose locating a record in a target table of the first equipment in the target database based on an identifier of the lot in the record; deleting the record from the target table of the first equipment in the target database; and

inserting the record into a target table of a second equipment in the target database in the context of claim 14 or otherwise.

Accordingly, the Examiner's burden of factually supporting a *prima facie* case of obviousness of claim 14 clearly cannot be met by the combination of Jeyaraman and Peters. Therefore, Applicants respectfully request that the Examiner withdraw the rejection under 35 U.S.C. §103 of claim 14 and its dependent claims.

Claim 22

Claim 22 recites:

22. A system for refining data replication between a source database and a target database, comprising of:
determining means for determining if a record in the source database has been changed as a result of a change of position of a lot from a first equipment to a second equipment;
locating means for locating the record in a target table of the first equipment in the target database based on an identifier of the lot in the record in response to a determination that the record in the source database has been changed;
deleting means for deleting the record from the target table of a first equipment in the target database; and
inserting means for inserting the record into a target table of the second equipment in the target database.

Claim 22 was also rejected under 35 U.S.C. §103(a) as being unpatentable over Jeyaraman in view of Peters. However, much in the same manner as described above with regard to claims 1, 9 and 14, the combination of Jeyaraman and Peters does not disclose locating a record in a target table of the first equipment in the target database based on an identifier of the lot in the record; deleting the record from the target table of the first equipment in the target database; and inserting the record into a target table of a second equipment in the target database in the context of claim 22 or otherwise.

Accordingly, the Examiner's burden of factually supporting a *prima facie* case of obviousness of claim 22 clearly cannot be met by the combination of Jeyaraman and Peters.

Therefore, Applicants respectfully request that the Examiner withdraw the rejection under 35 U.S.C. §103 of claim 22 and its dependent claims.

Conclusion

All matters set forth in the Office Action have been addressed. It is clear from all of the foregoing that independent claims 1, 9, 14, and 22 are in condition for allowance. Dependent claims 2-8, 10-13, 15-21, and 23-26 depend from and further limit independent claims 1, 9, 14, and 22 and therefore are allowable as well. Accordingly, it is believed that all claims are in condition for allowance.

An early formal notice of allowance of claims 1-26 is requested. Should the Examiner deem that an interview with Applicants' undersigned attorney would expedite consideration, the Examiner is invited to call the undersigned attorney at the telephone number indicated below.

Respectfully submitted,



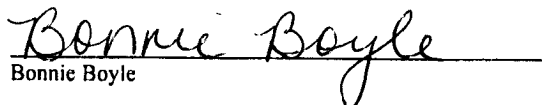
Dave R. Hofman
Registration No. 55,272

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HAYNES AND BOONE, LLP
901 Main Street, Suite 3100
Dallas, Texas 75202-3789
Telephone: 713/547-2523
Facsimile: 214/200-0853
Attorney Docket No.: 2001-1542 /
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Bonnie Boyle